

THE CITY OF NEW YORK LAW DEPARTMENT

100 CHURCH STREET NEW YORK, NY 10007 THOMAS B. ROBERTS

Phone: (212) 356-0872 Fax: (212) 356-2089 E-mail: throbert@law.nyc.gov (not for service)

May 22, 2019

By ECF

ZACHARY W. CARTER

Corporation Counsel

Honorable Ona T. Wang United States Magistrate Judge United States District Court Southern District of New York 500 Pearl Street New York, N.Y. 10007

Re: Lopez v. City of New York et. al, 17cv 3014 (VEC)(OTW)

Dear Judge Wang:

At your direction, I write on behalf of the Municipal Defendants with a proposed agenda for the conference scheduled in the above referenced matter for May 28, 2019 at 3:00 p.m. Counsel for Project Renewal, Inc. has advised me that he concurs with proposed agenda items 3 and 4 (as items 1 and 2 generally are not relevant to the claims against Project Renewal, Inc.). We suggest that the following items be discussed;

- 1. The Municipal Defendants' requests for HIPAA releases and section 160.50 releases from plaintiff;
- 2. Whether to issue an order to the New York County Family Court for records concerning Ms. Lopez, and if so who should be the recipient of the records;
- 3. Whether a settlement conference would be productive; and
- 4. The terms of any scheduling order in this matter.

Respectfully,

Thomas B. Roberts

Assistant Corporation Counsel